

1 IN THE UNITED STATES DISTRICT COURT

2
3 FOR THE EASTERN DISTRICT OF VIRGINIA

4 RICHMOND DIVISION

5 KATHY STEELE, Administrator of the Estate
6 of Robert David Steele

7 -and-

8 EARTH INTELLIGENCE NETWORK

9 Plaintiff,

10 vs.

11 JASON GOODMAN

12 Defendant

Case No.: 3:21-cv-00573-JAG

**RESPONSE TO MEMORANDUM IN
OPPOSITION**

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14 Defendant Jason Goodman ("Goodman") by and for himself pro se, respectfully submits
15 this response to plaintiffs' memorandum in opposition to the motion for leave to object to
16 discovery demands.

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18 **INTRODUCTORY STATEMENT**

19 This is sham litigation, described by the Honorable M. Hannah Lauck as a "spitting
20 contest" that should not be in federal court. This instant matter was deliberately initiated in the
21 wrong venue, for an improper purpose and has been continued by an improper plaintiff in
22 defiance of state and federal laws as described in defendant's objection (ECF No. 87).

23
24 Plaintiffs have repeatedly failed in their ongoing obligations to meet and confer in good
25 faith despite already having been admonished for this. Plaintiffs' counsel Steven Biss ("Biss")
26 has refused to accept or return phone calls except for the 26(f) conference and has ignored
27 emails. Plaintiffs made numerous written discovery requests that were not discussed in the 26(f)

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RESPONSE TO MEMORANDUM IN OPPOSITION - 1

1 conference or contradicted what had been agreed to on the call. Goodman contacted Biss by
 2 email on March 25, 2023 with questions about discrepancies in discovery requests. No response
 3 was received until April 16, 2023 (**EXHIBIT A**). It is simply false to claim that Goodman
 4 caused the delay. Plaintiffs have obstructed communication and deliberately caused delay so that
 5 they could provoke motions for sanctions as they now have, in an attempt to compel unnecessary
 6 and burdensome discovery. Given plaintiffs' past history and ongoing behavior, the risk that
 7 irrelevant information sought might be abused or mishandled outweighs its value in this matter.
 8

9 **BACKGROUND**

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 11 On June 13, 2017, George Webb Sweigert ("Webb") introduced defendant Goodman to
 12 deceased former plaintiff Robert David Steele ("RDS") telephonically. Goodman had never
 13 spoken with RDS prior to the telephonic meeting that was broadcast live on YouTube.
 14 ([https://odysee.com/@Crowdsourcethetruth:d/Robert-David-](https://odysee.com/@Crowdsourcethetruth:d/Robert-David-Steele:3?r=9922rETvx97mzYoXiHAUW8RPm7Lxq6A)
 15 [Steele:3?r=9922rETvx97mzYoXiHAUW8RPm7Lxq6A](https://odysee.com/@Crowdsourcethetruth:d/Robert-David-Steele:3?r=9922rETvx97mzYoXiHAUW8RPm7Lxq6A)). During the call, RDS informed
 16 Goodman of the existence of Earth Intelligence Network, ("EIN") an entity RDS claimed to be a
 17 501(c)(3) non-profit public charity in good standing and operating under his legitimate control.
 18 In good faith, Goodman allowed the promotion of the charitable fund-raising efforts on the
 19 broadcast. The following day, on a seemingly unrelated broadcast, Webb called Goodman again
 20 to report evidence Webb claimed indicated the presence of dangerous radiological material on
 21 the cargo vessel Maersk Memphis. The result was the closure of the Port of Charleston as the
 22 Court is already aware, ([https://www.nytimes.com/2017/06/15/us/port-dirty-bomb-south-](https://www.nytimes.com/2017/06/15/us/port-dirty-bomb-south-carolina.html)
 23 [carolina.html](https://www.nytimes.com/2017/06/15/us/port-dirty-bomb-south-carolina.html)). As the Court is also aware, this resulted in RDS sending an email to Goodman
 24 and Webb, alleging Goodman would be arrested, but advising Webb to continue working with
 25 RDS, prompting various statements by Goodman and this instant litigation.
 26
 27
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1 The sequence of events that catalyzed this sham litigation was little more than a
2 confidence scheme calculated by RDS, Webb and others. In the nearly six years since this event,
3 plaintiffs, their associates, and surrogates including plaintiffs' counsel Biss, Webb and Webb's
4 brother David George Sweigert ("Sweigert"), have endeavored to convince the public and to
5 cause the Court to create an official determination that Goodman is to blame for the incident.
6

7 The FBI notably does not share plaintiffs' views of the events of that day. Goodman has
8 not been arrested or charged despite the FBI investigation into the incident and Goodman's
9 communication with the Columbia, SC FBI field office. Plaintiffs' fabricated explanation of this
10 event as presented to the Court was intended to frame Goodman as the source of information
11 leading to the port closure, and the dispute that gave rise to this litigation. Despite the utter
12 falsity of plaintiffs' claims, they have been used as a pretext in multiple lawsuits against
13 Goodman as plaintiffs and Sweigert have subjected him to years of tag team litigation. (*See*
14 *Sweigert v Goodman Case 1:18-cv-08653-VEC*, *Sweigert v Goodman Case 1:22-cv-02788*,
15 *Sweigert v Multimedia System Design, Inc et al Case 2:22-cv-10642-GAD-EAS*, *Sweigert v*
16 *Cable News Newtwork Case 2:20-cv-12933-GAD-KGA*).
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19 **CYBERSTALKING AND JUDICIAL HARASSMENT**

20 This case is a component of a larger ongoing cyber harassment campaign coordinated by
21 Sweigert and initiated by deceased former plaintiff RDS. As the Court is aware, little more than
22 two weeks after plaintiffs brought this action in the Alexandria division in direct defiance of
23 Judge Lauck's oral order, Sweigert attempted to intervene and was denied (*See Case 1:20-cv-*
24 *01140-RDA-IDD ECF No. 8*). Sweigert had previously attempted to intervene in the initial
25 iteration of this case and was also denied (*See Case 3:17-cv-00601-MHL Document 153*).
26

27 Nothing about the circumstance had changed between the two attempts, Sweigert merely makes
28

1 a mockery of the Court as he uses it to harass Goodman with excessive frivolous filings. In what
2 can only be described as a disturbing psychotic obsession, Sweigert persistently endeavors to
3 frustrate Goodman in any way he can, nearly every day since this incident arose. In addition to
4 judicial harassment, Sweigert has engaged in an ongoing cyber harassment campaign. Sweigert
5 immediately came to plaintiffs' defense, declaring Goodman an "IRS snitch" and plaintiff Steele
6 an innocent widow (**EXHIBIT B**). By allowing this abuse of justice to continue, the Court
7 makes itself complicit with the ongoing harassment of Goodman.
8

9 **PLAINTIFFS ALREADY GRANTED EXTRAORDINARY LEAVE**

10
11 Plaintiffs have already been shown remarkable leniency. During the final hearing on this
12 matter, plaintiffs were ordered by the honorable M. Hannah Lauck that any continuation of their
13 litigation, "would have to be here, and it would have to be in my court." Nothing could be
14 clearer, yet this Court has allowed plaintiffs to brazenly defy judge Lauck's order offering no
15 explanation as to what legal precedent legitimizes such a decision. Such an order intends to
16 preserve judicial resources and allow efficient adjudication of any potentially legitimate claims.
17 Its inherent intent was to avoid rehashing of the spitting contest this Court has allowed. Having
18 spent time on these existing arguments, and demanding no similar case could return, Judge
19 Lauck could not have intended to allow plaintiffs more latitude for additional vexatious filings
20 such as the failed additional intervention attempt by Sweigert. The Court has chosen to allow
21 plaintiffs to defy orders plaintiff found unfavorable and now considers their pleading to hold
22 Goodman to the rules. Not granting leave would be a demonstration of bias in favor of plaintiffs.
23
24

25 **CONCLUSION**

26 The Court should grant Goodman leave to object to plaintiffs' discovery requests as they
27 are irrelevant and overbroad. Plaintiffs need only seek discovery that could answer questions
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1 pertaining to the legality of any defamation claim emanating from a deceased party in the
2 commonwealth of Virginia and the ability of a deceased director's family member to take control
3 of a public nonstock corporate entity. Neither the plaintiffs nor the Court have established any
4 precedent in which either of these occurrences have been allowed as a matter of law. No
5 discovery beyond these two issues should be allowed. Goodman further moves the Court to
6 overturn its prior illegal rulings pursuant to FRCP Rule 60(b)(4) as they currently place the Court
7 at odds with the law rendering them void.
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10 Signed this 2nd day of May 2023
11

12 Respectfully submitted,

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**CERTIFICATE OF SERVICE OF
SERVICE**

11
12 It is hereby certified that defendant, Jason Goodman, served plaintiff via email to their
13 counsel Steven Biss with a copy of the response to memorandum in opposition to motion seeking
14 leave to object to discovery requests.
15

16
17 Signed this 2nd day of May 2023

18 Respectfully submitted,

19
20 

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